

Steven J. McCardell (2144)
smccardell@djplaw.com
Kenneth L. Cannon II (3705)
kcannon@djplaw.com
DURHAM JONES & PINEGAR, P.C.
111 East Broadway, Suite 900
P.O. Box 4050
Salt Lake City, UT 84110-4050
Telephone: (801) 415-3000
Facsimile: (801) 415-3500

RECEIVED

FEB 02 2012

DIV. OF OIL, GAS & MINING

Attorneys for the Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

In re:

KOREA TECHNOLOGY INDUSTRY
AMERICA, INC. et al.,

Debtors.

Bankruptcy Case No. 11-32259
Jointly Administered

Chapter 11

Honorable R. Kimball Mosier

[FILED ELECTRONICALLY]

**NOTICE OF DEBTOR CROWN ASPHALT RIDGE, L.L.C.'S MODIFIED
APPLICATION TO EMPLOY NATURAL ASPHALT SOLUTIONS, INC.
AS MARKETING AND SALES AGENT AND NOTICE OF OBJECTION
DEADLINE AND NOTICE OF HEARING THEREON**

PLEASE TAKE NOTICE that Crown Asphalt Ridge, L.L.C. (the "Debtor" or "CAR"), debtor and debtor in possession, has filed an application (the "Application") for entry of an order authorizing its employment of Natural Asphalt Solutions, Inc. ("NAS") as its marketing and sales agent for the sale of oil sands as a paving material for road construction, effective as of January 1, 2012, pursuant to 11 U.S.C. §327(a), and Rules 2014 and 5002 of the Federal Rules of Bankruptcy Procedure. Copies of the Application (without a confidential schedule to the

Application) and the declaration of Kimball L. Young in support thereof have been served on the United States Trustee's office and certain other parties and is being served on other parties in interest in this case contemporaneously with this notice. If you do not receive a copy of the Application and the supporting declaration, you may obtain a copy of these documents by requesting them from the Debtor's undersigned counsel.

PLEASE TAKE FURTHER NOTICE that Schedule A to the Asphalt Product Marketing Agreement between the Debtor and NAS contains certain proprietary, confidential terms that the Court has permitted the Debtor to submit for *in camera* review by the Court and to serve only on certain creditors and other parties, subject to confidentiality. The confidential terms have to do with amount of tar sands the Debtor is to extract for sale, compensation to NAS as to different products that are being developed and for different amounts to be sold, with limited higher compensation for sales beyond a certain level as an incentive. The Debtor believes and asserts that the compensation terms are well within market terms. Parties wishing to review Schedule A must request the Debtor to provide such review and must execute a confidentiality agreement for the party and each individual representative of the party. The Debtor may object to such review by certain parties.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read this Notice and the Application and supporting documentation carefully and discuss them with your attorney, if you have one in this bankruptcy case.

PLEASE TAKE FURTHER NOTICE that, if you do not want the Bankruptcy Court to approve the Application, or if you want the Bankruptcy Court to consider your views on the Application, then you or your attorney must file with the Bankruptcy Court and serve on the

counsel for the Debtor a written objection to the Application in conformity with Rule 9013 of the Bankruptcy Court's local rules of practice so that it is received no later than **Monday, February 21, 2012, at 4:30 p.m., MST.** Your objection must be filed at:

Clerk
United States Bankruptcy Court
350 South Main Street, # 301
Salt Lake City, Utah 84101

PLEASE TAKE FURTHER NOTICE that, if you file an objection and if any part of your objection is based on information contained in Schedule A to the Agreement, you must, pursuant to the Court's Order entered January 31, 2012 Granting *Ex Parte* Motion for Leave to Submit for *In Camera* Review Portions of Application of Debtor Crown Asphalt Ridge, L.L.C. to Employ Natural Asphalt Solutions, Inc. as Marketing and Sales Agent (the "Protective Order"), submit such objections in paper format under seal with the objection clearly marked as filed under seal. Such objections may not be filed electronically.

PLEASE TAKE FURTHER NOTICE that, if you mail your objection to the Bankruptcy Court for filing, you must mail it early enough so the Court will receive it on or before the time and date stated above. You must also serve your objection on the undersigned counsel for the Debtors and on other parties in interest.

PLEASE TAKE FURTHER NOTICE that the Application will come on for hearing before the Honorable R. Kimball Mosier, United States Bankruptcy Judge, on **Wednesday, February 23, 2012, at 1:30 p.m., MST,** in his courtroom, Room 369 of the Frank E. Moss United States Courthouse, 350 South Main Street, Salt Lake City, Utah 84101. You or your attorney must attend the hearing on the Application if you want your objection to be considered by the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 9013-1(d) and (f) of the Bankruptcy Court's local rules of practice, absent timely filing and service of objections to the Application, the Debtor may ask that the Court to approve the Application without further notice or hearing. Additionally, upon the resolution of any timely filed and served objections to the Application, the Debtor may ask the Bankruptcy Court to approve the Application without further notice or hearing.

DATED this 1st day of February, 2012.

DURHAM JONES & PINEGAR, P.C.

By: /s/ Kenneth L. Cannon II
Steven J. McCardell
Kenneth L. Cannon II
111 East Broadway, Suite 900
P.O. Box 4050
Salt Lake City, UT 84110-4050
Telephone: (801) 415-3000
Facsimile: (801) 415-3500

Attorneys for Debtors and
Debtors in Possession